



January 8, 2016

VIA ECF

The Honorable Charles R. Breyer
United States District Court
450 Golden Gate Avenue
San Francisco, CA 94102

Re: ***In re Volkswagen "Clean Diesel" Marketing, Sales Practices and Products
Liability Litigation, MDL No. 2672***

Dear Judge Breyer:

Pursuant to Pretrial Order No. 2, I respectfully submit this letter application for a steering committee position in the above-referenced matter. A listing of my relevant MDL and JCCP appointments is contained in my CV, which is attached hereto as Appendix A.

I am a founding partner of Skikos, Crawford, Skikos & Joseph, a San Francisco-based law firm specializing in consumer remedy and product liability claims. My firm has extensive experience in both MDL and state coordinated proceedings, and has served in a variety of roles, including as lead counsel, liaison counsel, members of steering committees, members of executive committees and on a multitude of sub-committees. We have also represented class members in both class action and bankruptcy settings, and have served in an official capacity on committees related thereto. Finally, my firm and I have played a significant role in working with courts, defense counsel and plaintiffs' counsel to create, implement and administer the resolution of numerous mass tort MDL and/or JCCP litigations, with claimants often numbering in the thousands or tens of thousands.

(1) Pertinent experience in this type of litigation.

Focusing on just San Francisco and just over the last three years, this firm has been in a key leadership position in each of the three mass tort JCCP's and national litigations. I presently serve as Co-Lead Counsel in the *In Re: DePuy Orthopedics Inc ASR Hip Implant Prods. Multidistrict Litigation, MDL No. 2197 (N.D. Ohio)*. I also serve on the Plaintiffs' Steering Committee in the California Coordinated Proceeding *DePuy ASR Hip System Cases*, JCCP No. 4649. The cooperation between the MDL and the various independent jurisdictions and, ultimately, between the parties to a contentious litigation involving tens of thousands of claimants led to two successful national settlement programs.

I serve as Co-Lead Counsel and Plaintiffs' Liaison Counsel in the California Coordinated Proceeding *Reglan/Metoclopramide Cases* Litigation, JCCP No. 4631. The plaintiffs have successfully resolved a portion of that litigation and the national settlement programs are being run out of the San Francisco JCCP. The litigation involves thousands of claimants and numerous defendants.



I served on the Plaintiffs' Executive Committee and Plaintiffs' Steering Committee in the *In re: Gadolinium Contrast Dyes Products Liability Litigation*, MDL No. 1909 (N.D. Ohio). I also served as Liaison Counsel in the California Coordinated Proceeding *Gadolinium Medical Cases*, JCCP No. 4546. This litigation lasted several years, involving four different defendant manufacturers, and over a thousand plaintiffs nationally. This litigation has successfully resolved and is closed.

(2) Contact information for judges presiding over the matters referenced in item (1).

In re: DePuy Orthopedics Inc. ASR Hip Implant Prods. Multidistrict Litigation, MDL No. 2197 (N.D. Ohio)

The Honorable David A. Katz
United States District Court, Northern District of Ohio
James M. Ashley and Thomas W.L. Ashley U.S. Courthouse
1716 Spielbusch Avenue, Room 307
Toledo, Ohio 43604-1363
Phone: (419) 213-5710

In re: Gadolinium Contrast Dyes Products Liability Litigation, MDL No. 1909 (N.D. Ohio)

The Honorable Dan A. Polster
United States District Court, Northern District of Ohio
Carl B. Stokes United States Court House
801 West Superior Avenue, Courtroom 18B
Cleveland, Ohio 44113-1837
Phone: (216) 357-7190

DePuy ASR Hip System Cases, JCCP No. 4649
Reglan/Metoclopramide Cases Litigation, JCCP No. 4631
Gadolinium Medical Cases, JCCP No. 4546

The Honorable Richard Kramer (ret.)
JAMS
Two Embarcadero Center, Suite 1500
San Francisco, CA 94111
Phone: (415) 982-5267

(3) Willingness and ability to immediately commit to time-consuming litigation.

My firm and I are willing and able to immediately commit the considerable time and resources necessary to assist in the prosecution of this matter.



(4) Willingness and ability to work cooperatively with other plaintiffs' counsel and defense counsel.

My firm and I have worked cooperatively and successfully with courts, plaintiffs' counsel and defense counsel on numerous mass tort MDL and/or JCCP litigations, often involving multiple defendants and thousands, and sometimes tens of thousands, of claimants. We are willing and able to assist in the prosecution of this matter with this same high level of cooperation and professionalism.

(5) Access to resources to prosecute this litigation in a timely manner.

My firm has, and is able to devote, significant resources, in terms of both personnel and funding, to assist in the prosecution of this matter in a timely and efficient manner.

(6) Willingness to serve as lead counsel, a member of a steering committee, or both.

I am willing to serve as a member of a steering committee.

(7) The particular category of plaintiffs to be represented.

I am willing to serve as a member of a steering committee for all plaintiffs, or for any of the subcategories of claimants (*i.e.*, vehicle owners, vehicle lessees and/or car dealerships).

(8) Additional qualifications to consider.

In the last five years, San Francisco has been a center for three national litigations, each of which involved significant litigation, cooperation and coordination with multiple independent jurisdictions, courts, hundreds of plaintiffs' law firms, thousands of claimants, and all of which have or had successful national settlement programs. My firm and I have played significant role in each of these three litigations, and in fact, has been lead counsel in two of them.

Respectfully submitted,

/s/ Steven J. Skikos

STEVEN J. SKIKOS

SJS/mc

APPENDIX A

CURRICULUM VITAE

Steven J. Skikos

EDUCATION

Hastings School of Law, San Francisco, CA

Juris Doctor, 1990

Executive Publications Editor, *Hasting International and Comparative Law Review*

Recipient of the Hastings 1066 Scholar Award

Notre Dame University, South Bend, IN

Bachelor of Arts with Honors, 1987

EMPLOYMENT

Skikos, Crawford, Skikos & Joseph San Francisco, CA

Founding Partner & Co-Managing Partner (2008 – Present)

Lopez, Hodes, Restaino, Milman & Skikos, San Francisco, CA

Managing Partner, San Francisco Office (1996 – 2008)

Ropers Majeski, Kohn & Bentley, San Francisco, CA

Attorney (1990-1996)

RELEVANT MDL AND JCCP LEADERSHIP POSITIONS

Co-Lead Counsel appointment by the Honorable David A. Katz in the *In re: DePuy Orthopedics Inc. ASR Hip Implant Prods. Multidistrict Litigation*, MDL No. 2197 (N.D. Ohio)

Plaintiffs' Steering Committee appointment by the Honorable Richard A. Kramer in the California Coordinated Proceeding *DePuy ASR Hip System Cases*, JCCP No. 4649

Co-Lead Counsel (Plaintiffs' Liaison) appointment by the Honorable Richard A. Kramer in the California Coordinated Proceeding *Reglan/Metoclopramide Cases Litigation*, JCCP No. 4631

Plaintiffs' Executive Committee and Plaintiffs' Steering Committee appointment by the Honorable Dan A. Polster in *In re: Gadolinium Contrast Dyes Products Liability Litigation*, MDL No. 1909 (N.D. Ohio)

Plaintiffs' Liaison Counsel appointment by the Honorable Richard A. Kramer in the California Coordinated Proceeding *Gadolinium Medical Cases*, JCCP No. 4546

Plaintiffs' Executive Committee and Co-Liaison Counsel appointment by the Honorable Carolyn B. Kuhl in the California Coordinated Proceeding *Yaz, Yasmin and Ocella Contraceptive Cases*, JCCP No 4608

State-Federal Liaison Counsel to the Consolidated California Litigation appointment by the Honorable David R. Herndon in the *In re: Yasmin and Yaz (Drospirenone)*

Marketing, Sales Practices and Products Liability Litigation, MDL No. 2100 (S.D. Illinois)

Plaintiffs' Executive Committee appointment by the Honorable Steven L. Perk in the California Coordinated Proceeding *Fosamax/Alendronate Sodium Drug Cases*, JCCP No. 4644

Plaintiffs' Executive Committee appointment by the Honorable Kenneth R. Freeman in the California Coordinated Proceeding *Actos Product Liability Cases*, JCCP No. 4696

Plaintiffs' Co-Liaison Counsel appointment by the Honorable Kim Dunning in the California Coordinated Proceeding *Zoloft Birth Defect Cases*, JCCP No. 4771

Plaintiff's Steering Committee appointment by the Honorable Anthony J. Mohr in the California Coordinated Proceeding *Toyota Motor Cases*, JCCP No. 4621

Plaintiffs' Liaison Counsel appointment by the Honorable Emilie H. Elias in the California Coordinated Proceeding *In re: Ortho Evra Litigation*, JCCP No. 4506

Plaintiffs' Liaison Counsel appointment by the Honorable Wendell Mortimer, Jr. in the California Coordinated Proceeding *In re: Baycol Cases I and II*, JCCP Nos. 4217 and 4223

Plaintiffs' Liaison Counsel appointment by the Honorable Ronald L. Styn in the California Coordinated Proceeding *In re: Metabolife 365 Cases*, JCCP No. 4360

Co-Liaison Counsel appointment by the Honorable Anthony J. Mohr in the California Coordinated Proceeding *In re: PPA Litigation*, JCCP No. 4166

Co-Liaison Counsel appointment by the Honorable Carl J. West in the California Coordinated Proceeding *In re: Rezulin Litigation*, JCCP No. 4122

Science and Expert Committee appointment by the Honorable Lewis A. Kaplan in *In re Rezulin Products Liability Litigation*, MDL No. 1385 (S.D. New York)

Science and Expert Committee appointment by the Honorable Jed S. Rakoff in the *In re: Ephedra Products Liability Litigation*, MDL No. 1598 (S.D. New York)

"706 National Expert Committee" appointment by the Honorable Sam C. Pointer in *In re: Silicone Gel Breast Implant Products Liability Litigation*, MDL No. 926 (S.D. Alabama)

PROFESSIONAL AFFILIATIONS

State Bar of California
San Francisco Bar Association
Consumer Attorneys of California
American Association for Justice
Hellenic Law Society